

Message

From: Charlton, Tom [Charlton.Tom@epa.gov]
Sent: 12/17/2020 4:51:35 PM
To: Haas, Craig [Haas.Craig@epa.gov]; Tham, Kan [Tham.Kan@epa.gov]; Andrea Schnitzer [Andrea.Schnitzer@erg.com]
CC: Hayes, Sharon [Hayes.Sharon@epa.gov]; Spencer Sauter [spencer.sauter@erg.com]; Wasem, Russell [Wasem.Russell@epa.gov]; Nguyen, Thuy [Nguyen.Thuy@epa.gov]; Teter, Royan [Teter.Royan@epa.gov]; Varco, Joseph [varco.joseph@epa.gov]
Subject: RE: Clarke Mosquito Control: ANVIL 10+10 ULV (EPA Reg. No. 1021-1688-8329) Container Purchase/Delivery/Analytical Details

Craig: Thank you very much for so much help on such short notice.

Happy Holidays!

Tom Charlton, Attorney
Waste and Chemical Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Tel: (202) 564-6960
Fax: (202) 564-0035

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From: Haas, Craig <Haas.Craig@epa.gov>
Sent: Thursday, December 17, 2020 11:42 AM
To: Tham, Kan <Tham.Kan@epa.gov>; Andrea Schnitzer <Andrea.Schnitzer@erg.com>
Cc: Hayes, Sharon <Hayes.Sharon@epa.gov>; Charlton, Tom <Charlton.Tom@epa.gov>; Spencer Sauter <spencer.sauter@erg.com>; Wasem, Russell <Wasem.Russell@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>
Subject: RE: Clarke Mosquito Control: ANVIL 10+10 ULV (EPA Reg. No. 1021-1688-8329) Container Purchase/Delivery/Analytical Details

I just issued the TD, and if more clarification is needed Andy will be in touch directly.

Craig

From: Tham, Kan <Tham.Kan@epa.gov>
Sent: Thursday, December 17, 2020 11:38
To: Andrea Schnitzer <Andrea.Schnitzer@erg.com>
Cc: Hayes, Sharon <Hayes.Sharon@epa.gov>; Haas, Craig <Haas.Craig@epa.gov>; Charlton, Tom <Charlton.Tom@epa.gov>; Spencer Sauter <spencer.sauter@erg.com>; Wasem, Russell <Wasem.Russell@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>
Subject: RE: Clarke Mosquito Control: ANVIL 10+10 ULV (EPA Reg. No. 1021-1688-8329) Container Purchase/Delivery/Analytical Details

Hi Andy and Spencer,

This time, Region 1 is buying the empty plastic containers from Clarke Mosquito directly for testing of coating on the plastic container. You were involved in the recently purchased with Rusty Wasem on the 2 cases (4-2.5 gallon jugs) of Anvil 10+10. We are buying these empty containers directly from Karen Larson of Clarke Mosquito, from Illinois.

Please see below the quotes from Karen Larson of Clarke Mosquitos:

Qty	Item	Description	Unit Cost	Total
2	11358-B	JUGS PLAIN 2.5 gal	2.01	4.02
2	40012	CAPS (PELLETS/2x2.5GAL)	0.29	0.58
2	11134-C	HDPE PLASTIC DRUM, 30 GAL	55.82	111.64
2	11134-B	HDPE PLASTIC DRUM, 55 GAL	58.37	116.74
8	40011	POLY CAPSEAL WHIT 2" RCP200	0.31	2.48
Freight, Single pallet, 2-day delivery to Ft. Meade or Wall Experiment Station in Massachusetts				393.45
Total				628.91

Please let me know if you have any questions,

Kan S. Tham
Toxics, Pesticides and Drinking Water Compliance Section
US EPA Region 1 (New England)
5 Post Office Square, Suite 100
Mail Code (OES05-4)
Boston, MA 02109-3912
617-918-1872 (phone)
617-918-0872 (fax)
Tham.kan@epa.gov

From: Haas, Craig <Haas.Craig@epa.gov>
Sent: Thursday, December 17, 2020 10:57 AM
To: Charlton, Tom <Charlton.Tom@epa.gov>
Cc: Hayes, Sharon <Hayes.Sharon@epa.gov>; Tham, Kan <Tham.Kan@epa.gov>
Subject: FW: Clarke Mosquito Control: ANVIL 10+10 ULV (EPA Reg. No. 1021-1688-8329) Container Purchase/Delivery/Analytical Details

Tom, ERG doubts they can meet the December deadline, and please provide the additional information, highlighted below.

From: Andrea Schnitzer <Andrea.Schnitzer@erg.com>
Sent: Thursday, December 17, 2020 10:55
To: Haas, Craig <Haas.Craig@epa.gov>
Cc: Spencer Sauter <spencer.sauter@erg.com>
Subject: RE: Clarke Mosquito Control: ANVIL 10+10 ULV (EPA Reg. No. 1021-1688-8329) Container Purchase/Delivery/Analytical Details

Hi Craig,

Yes, we can make these purchases though I doubt we can get the material delivered to the lab by 12/21 given that it's already 12/17. We can certainly get started, though. If the seller doesn't deliver themselves, is there a particular shipping service you'd like us to try to use (e.g., UPS, FedEx, etc.)?

I see the details about what to purchase and in what quantity, as well as the shipping addresses and contacts. What I don't see is information about the seller – either a website or a company contact. Can Region 1 please supply that so we're sure to purchase from the correct supplier?

You can issue a revised TD5 and add to the table of products that you've directed us to purchase.

Andy

Andrea Schnitzer
Eastern Research Group, Inc.
2300 Wilson Blvd., Ste. 350 | Arlington, VA, 22201
o/c: 202-812-9408 | e: andrea.schnitzer@erg.com

From: Haas, Craig <Haas.Craig@epa.gov>
Sent: Thursday, December 17, 2020 10:41 AM
To: Andrea Schnitzer <Andrea.Schnitzer@erg.com>
Subject: FW: Clarke Mosquito Control: ANVIL 10+10 ULV (EPA Reg. No. 1021-1688-8329) Container Purchase/Delivery/Analytical Details
Importance: High

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Andy, can you make these purchases and the delivery to the Fort Meade Lab in the time frame described below? If so, I assume I'll need to issue a new TD for this, right?

From: Charlton, Tom <Charlton.Tom@epa.gov>
Sent: Thursday, December 17, 2020 10:39
To: Haas, Craig <Haas.Craig@epa.gov>
Cc: Bellot, Michael <Bellot.Michael@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Miles, James <miles.james@epa.gov>; Tham, Kan <Tham.Kan@epa.gov>; Hayes, Sharon <Hayes.Sharon@epa.gov>
Subject: FW: Clarke Mosquito Control: ANVIL 10+10 ULV (EPA Reg. No. 1021-1688-8329) Container Purchase/Delivery/Analytical Details
Importance: High

Craig: Mike Bellot suggested that I reach out to you in your capacity as "contract guy". Joe Varco, BTW, is out of the rest of the year. Region 1 and WCED management would like to have ERG to make two purchases from Clarke Industries.

One purchase would be for two 2.5 gallon containers and we would like this delivered to the Fort Meade Lab by around December 21-22.

The second purchase would be two 30 gallon and two 55 gallon plastic drums and those would be delivered to separate location. I am not sure what date is best for them.

These purchases relate to EPA's investigation into potential FIFRA violations.

The purchase details are listed below. Kan Tham, copied above is the point person on these transactions. WCED management has approved these purchases.

Please let me know if there is anything you need from me to complete these purchases.

Thank you. Tom

Tom Charlton, Attorney
Waste and Chemical Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Tel: (202) 564-6960
Fax: (202) 564-0035

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From: Hayes, Sharon <Hayes.Sharon@epa.gov>
Sent: Tuesday, December 15, 2020 4:17 PM
To: Charlton, Tom <Charlton.Tom@epa.gov>
Cc: Varco, Joseph <varco.joseph@epa.gov>; Bellot, Michael <Bellot.Michael@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Tham, Kan <Tham.Kan@epa.gov>; Bowman, John <[Bowman.John@epa.gov](mailto: Bowman.John@epa.gov)>; Martinez, Hugh <martinez.hugh@epa.gov>; McGuire, Karen <Mcguire.Karen@epa.gov>; c.mark.smith@state.ma.us; oscar.pancorbo@mass.gov; Calvo, Estrella <calvo.estrella@epa.gov>
Subject: Clarke Mosquito Control: ANVIL 10+10 ULV (EPA Reg. No. 1021-1688-8329) Container Purchase/Delivery/Analytical Details
Importance: High

Hi Tom,

Here are the purchase, delivery, and analytical details:

For questions, please contact Kan Tham at 617-918-1872 or at tham.kan@epa.gov. Please have Clarke provide notification, tracking number, chain of custody and tamper-resistant packaging information to Kan.

Assuming the same EPA contractor will be used for this transaction, here is their contact info:

Andrea Schnitzer
Spencer Sauter
Easter Research Group, Inc.
2300 Wilson Blvd., Ste 350
Arlington, VA 22201
Email: andrea.schnitzer@erg.com
Email: Spencer.Sauter@erg.com

It is strongly recommended that Chemists Thuy Nguyen (EPA) and Oscar Pancorbo (MADEP) connect directly regarding all questions concerning the solvent rinsate protocol, shipping details, etc.

Purchase and Ship to:

Thuy Nguyen
Analytical Chemistry Branch
USEPA/OPP/Biological and Economic Analysis Division (7503P)
Environmental Science Center

701 Mapes Road
Ft Meade, Maryland 20755-5350
Phone (410) 305 2905

- Two (2) 250 ml containers of Anvil from Clarke's newly run commercial batch (placed directly into glass containers, without coming into contact with any other substance/product/equipment potentially containing PFAS). No cost associated with this. Ft Meade will split and send split to Alpha Analytical (see contact info below).
- Empty containers from Clarke as follows:

<u>Qty</u>	<u>Item</u>	<u>Description</u>	<u>Unit Cost</u>	<u>Total</u>
2	11358-B	JUGS PLAIN 2.5 gal	2.01	4.02
2	40012	CAPS (PELLETS/2x2.5GAL)	0.29	0.58

- Ft Meade to perform and collect solvent (methanol) rinsate samples of the inside and outside of each container, analyze all rinsate samples for PFAS and send splits to Alpha Analytical for analysis. Analysis by Ft Meade and Alpha to be performed using EPA's Method 533 (PFAS in water).

Purchase and Ship to:

Oscar C. Pancorbo, Ph.D.
Senator William X. Wall Experiment Station
Massachusetts Department of Environmental Protection
37 Shattuck Street
Lawrence, MA 01843
Mobile: (978) 987-3187
Direct Line: (978) 242-1314
Oscar.Pancorbo@mass.gov

- Empty containers from Clarke as follows:

<u>Qty</u>	<u>Item</u>	<u>Description</u>	<u>Unit Cost</u>	<u>Total</u>
2	11134-C	HDPE PLASTIC DRUM, 30 GAL	55.82	111.64
2	11134-B	HDPE PLASTIC DRUM, 55 GAL	58.37	116.74
8	40011	POLY CAPSEAL WHIT 2" RCP200	0.31	2.48

- MADEP lab to perform and collect solvent (methanol) rinsate samples of the inside and outside of each container, send split samples to both Ft Meade and to Alpha Analytical for analysis. Analysis by Ft Meade and Alpha to be performed using EPA's Method 533 (PFAS in water).
- The shipment needs to arrive on a regular workday Monday-Thursday 8:30 am to 3:00 pm and the lab needs to know the actual delivery date and approximate time ahead of time to make sure someone in the lab is available to accept the delivery; the driver can call Deanne Daneau (mobile phone: 617-694-8233) if delayed and upon arrival at the lab.

Alpha Analytical Info:

Jim Todaro
Quality Assurance Officer/Health & Safety Manager
Alpha Analytical
320 Forbes Boulevard
Mansfield, MA 02048-1806

Email: jtodaro@alphalab.com
Direct: 508-439-5101 | Main: 508-898-9220

Sharon M. Hayes, Chief
Toxics, Pesticides & Drinking Water Compliance Section
US EPA Region 1 (New England)
5 Post Office Square, Suite 100 (05-4)
Boston, MA 02109-3912
617-918-1328
hayes.sharon@epa.gov

To report a potential violation:
<https://echo.epa.gov/report-environmental-violations>